

## Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. No claims have been amended, added or canceled. Thus, claims 1-15 are pending.

### CLAIM REJECTIONS – 35 U.S.C. § 102(b)

Claims 1-4 and 11-14 were rejected as being anticipated by U.S. Patent No. 5,657,086 issued to Tahara, et al. (*Tahara*). For at least the reasons set forth below, Applicants submit that claims 1-4 and 11-14 are not anticipated by *Tahara*.

Claim 1 recites:

performing an encoding transformation on a set of data representing a video frame as frame-based data **and** as field-based data to generate arrays of frame-based data and arrays of field-based data;  
selecting either the arrays of frame-based data or field-based data based, at least in part, on the number of non-zero coefficients in the frame-based data and the field-based data; and  
converting an ordering of the arrays of selected data.

Similarly, claim 11 recites:

means for performing an encoding transformation on a set of data representing a video frame as frame-based data and as field-based data to generate arrays of frame-based data and arrays of field-based data;  
means for selecting either the arrays of frame-based data or field-based data based, at least in part, on the number of non-zero coefficients in the frame-based data and the field-based data; and  
means for converting an ordering of the arrays of selected data.

Thus, Applicants claim performing **both** frame-based transformation **and** field-based transformation of a video frame. **Either** the frame-based transformation or the field-

based transformation is selected based, at least in part, on the number of non-zero coefficients in the frame-based transformation and the field-based transformation.

*Tahara* discloses:

...encoding picture signals in which *either* frame-based orthogonal transformation *or* field-based orthogonal transformation is selected using DCT coefficients.

See col. 14, lines 6-9 (emphasis added). Thus, *Tahara* discloses performing either frame-based transformation or field-based transformation, not both. Therefore, *Tahara* cannot anticipate the invention as claimed in claim 1.

Claims 2-4 depend from claim 1. Claims 12-14 depend from claim 11. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 2-4 and 12-14 are not anticipated by *Tahara* for at least the reasons set forth above.

CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 5-10 and 15 were rejected as being unpatentable over *Tahara* in view of U.S. Patent No. 5,737,020 issued to Hall, et al. (*Hall*). For at least the reasons set forth below, Applicants submit that claims 5-10 and 15 are not rendered obvious by *Tahara* and *Hall*.

The Office Action states that *Tahara* does not disclose an 8x8 matrix, but

...Hall et al teaches ordering of the arrays of data coefficients comprising means for performing zig zag conversion wherein an 8 X 8 matrix having an original order being converted in to having a scanning order of a regular patten from upper left to the bottom right (Fig. 2).

See page 3.

Applicants agree with the Office Action that *Tahara* does not disclose an 8x8 matrix. However, the matrices of *Hall* is merely an 8x8 matrix of pixels converted to an 8x8 matrix of DCT coefficients converted to a quantized, zig-zag scanned set of coefficients. Nothing in Figure 2 of *Hall* teaches or suggests the conversion and/or ordering of claims 5, 10 and 15. Therefore, no combination of *Tahara* and *Hall* can teach or suggest the invention of claims 5, 10 and 15.

The Office Action states that *Tahara* does not disclose use of software to perform the operations of claims 6-9 and that *Hall* discloses that processing may be performed in hardware or software. However, *Hall* does not cure the deficiencies of *Tahara* as set forth above. Therefore, even if the methods of *Tahara* were accomplished in software, the result would not be the invention as claimed in claims 6-9. Therefore, no combination of *Tahara* and *Hall* can teach or suggest the invention as claimed in claims 6-9.

#### CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-15 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.


Application No. 10/041,750  
• Amendment dated November 17, 2004  
Response to Office Action of August 17, 2004

Atty. Docket No. 4860P2739  
Examiner An, Shawn S.  
TC/A.U. 2613

Please charge any shortages and credit any overcharges to our Deposit Account number  
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Respectfully submitted,  
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